

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
)
)
v.) **CRIMINAL NO.: 04-10231-MLW**
)
LOUIS PARADISO)
)

MOTION TO EXTEND DEFENDANT'S SURRENDER DATE

Defendant, Louis Paradiso, respectfully moves this Honorable Court to extend the date he is required to surrender to begin serving his sentence from January 8, 2007, at 2 p.m. to February 12, 2007, at 2 p.m., and states in support of this motion, by and through undersigned counsel, the following:

1. The Judgment entered in the above-captioned matter requires defendant to surrender for service of his sentence at the institution designated by the Bureau of Prisons before 2 p.m. on Monday, January 8, 2007.
2. On Wednesday, January 3, 2007, undersigned counsel contacted the United States Marshal's office in Boston, and spoke to Ron Bevin, Criminal Clerk for the U.S. Marshal's Office, who advised undersigned counsel that he had not yet received defendant's Judgment and Commitment Order.
3. Mr. Bevin further informed undersigned counsel that it would take approximately four (4) weeks for the Bureau of Prisons to complete its designation process once it receives the defendant's Judgment and Commitment Order.
4. Undersigned counsel also consulted with Assistant United States Attorney Victor A. Wild yesterday and today regarding the government's assent to an extension of defendant's

surrender date and Mr. Wild has indicated that the government will take no position on defendant's request.

WHEREFORE, defendant respectfully requests this Honorable Court to extend the date he is required to surrender from January 8, 2007, at 2 p.m. to February 12, 2007, at 2 p.m.

Respectfully submitted,
For defendant,
Louis Paradiso
By his attorney,

/s/ Scott P. Lopez
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Dated: January 4, 2007

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I previously conferred with counsel for the government, Assistant U.S. Attorney Victor A. Wild, in a good faith attempt to resolve or narrow the issue in this motion.

/s/ Scott P. Lopez
Scott P. Lopez

CERTIFICATE OF SERVICE

I, Scott P. Lopez, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 4, 2007.

/s/ Scott P. Lopez
Scott P. Lopez